

Stephen E. Siegrist
New Jersey Managing Partner

Law Offices
O'CONNOR KIMBALL LLP

51 Haddonfield Road
Suite 330
Cherry Hill, NJ 08002-4805
(856) 663-9292
FAX (856) 663-6566
Web site: www.oconnorkimball.com
E-Mail: ssiegrist@okllp.com

PENNSYLVANIA OFFICE
Two Penn Center Plaza
Suite 1100
Philadelphia, PA 19102
(215) 564-0400
FAX (215) 564-1973

August 5, 2016

Honorable James B. Clark, III, U.S.M.J.
United State District Court
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

RE: Ivan G. McKinney v. Dr. Hemsley, Capt Pawson, et als
Civil Action No: 14-03564

Dear Judge Clark:

I represent defendant Dr. Hemsley in this case in which the plaintiff is pro se.

I am writing to request the Court's direction on how to resolve a discovery issue with the pro se plaintiff who is currently incarcerated. I do not want to file a motion without authority from the Court to proceed in that manner.

I have received a letter, Court document # 42, from plaintiff, Mr. McKinney, in which he says that he is not satisfied with Dr. Hemsley's answers to Interrogatories and Response to a Notice to Produce Documents, and therefore, Mr. McKinney will not sign the HIPAA authorizations for his medical records from the Bergen County Jail and the NJ State Prison.

I sent the defendant's discovery responses to Mr. McKinney on July 12, 2016, and noted in my cover letter that Dr. Hemsley reserved the right to amend the discovery responses once he has had the opportunity to receive and review Mr. McKinney's medical records.

I cannot defend my client, Dr. Hemsley, without the medical history of the plaintiff, both at the Bergen County Jail and subsequently at the NJ State Prison. Therefore, I request the Court's direction on how it wishes me to proceed with this disputed discovery issue, either by way of a phone conference with Your Honor, or a motion.

Respectfully submitted,
O'CONNOR KIMBALL LLP
s/Stephen E. Siegrist
STEPHEN E. SIEGRIST

Cc: Ivan G. McKinney, plaintiff pro se, #601321